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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA

6:20-cr-00158-MC

v.

**GOVERNMENT'S SENTENCING
MEMORANDUM**

PIERCE MATTHEW MORROW,

**Sentencing: December 3, 2020
at 11:00 a.m.**

Defendant.

Defendant Pierce Morrow possessed and distributed child pornography for two years, chatted online about engaging in sex with minors, and engaged in a campaign of online harassment and threats. He started chat conversations by sharing a nude image of a 12 to 16-year-old boy and sometimes pretended to be that boy to bait others.

Morrow not only harmed the child pornography victims by distributing their images, he harmed those he sent the images to and those from whom he solicited nude images. And while

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Morrow claimed he received no gratification from child pornography and that he was directed by others to solicit child pornography, the facts belie this. Morrow was not the victim here, he was the perpetrator, and he must be held accountable. A lengthy sentence is warranted to protect the public. The government, therefore, recommends 108 months' imprisonment with 10 years' of supervision to follow.

Factual Background

A. The Offense Conduct

From at least July 2017 to January 2018, Morrow participated in the “Kid Porn Trade” Kik group, whose members posted images, videos and links containing child pornography. And Morrow admitted to the FBI that he had posted child pornography images and videos for the two years prior to his arrest. The images he posted were graphic—they included images and videos of prepubescent boys and girls engaged in vaginal intercourse and boys performing and receiving oral and anal sex with other boys and with adult males.

Morrow started Kik and Grindr chats by sharing an image of a 12 to 16-year-old nude boy—who he sometimes pretended to be to bait the other person. He even posted that he “Baited a few boys” who “got cat fished,” and posted a request seeking more images from a particular child pornography series. Morrow, using his knowledge of his peers from growing up in Bend, harassed online multiple individuals he knew, sometimes managing to acquire nude images of them and making threats to obtain more. He even openly assumed the identity of another person in making online threats—resulting in a victim believing that person—not Morrow—was harassing them. The victim then obtained a restraining order against that person.

Morrow's victims made reports and complaints to the police and to social media providers. One victim, whose nude images were on Morrow's phone, described the messages as relentless, aggressive and threatening, and though he tried to block them harassment continued via multiple newly created accounts. The victim said that it is difficult to be a gay young man in a small town, and that the harassment made it harder, causing him to seek additional therapy.

A January 2018 chat between Morrow and a young adult male in Bend is particularly troubling. It shows that Morrow not only sent unsolicited images of child pornography, but he enticed the other man to consider sex with children, reassuring him that it was safe and that Morrow did it as well. Morrow even described how he lured minors and provided them with marijuana or a sedative, and also claimed he had redacted one of the photographs of him purportedly having sex with a girl in order to remove details of his room—making the scenario even more realistic. And while follow-up interviews of identifiable minors who Morrow claimed to have had sex with, or who he had photographs of on his devices, did not reveal any evidence of abuse, it remains deeply disturbing. Morrow essentially encouraged someone who expressed an interest in having sex with children that it could be done, and done safely. Excerpts of this chat string follow, and errors are in the original:

Morrow shares a digital image of a nude young male

Woodcocklong- "Damn that's a really young boy"

Morrow- "Yeah I have a few in mind. I sell them weed, get them nice and stoned first. Are you into that or no?"

Woodcocklong- "It seems sketchy. How do I know that you're real?"

Morrow- "We can meet up and talk about it if you'd like. You can meet them first too. You can ask me whatever you want dude."

Morrow sends an image of what appears to be an adult male straddling a young girl's head while his penis is in her mouth.

Woodcocklong- "Why did you choose me specifically to send that pic and have this convo? It's pretty risky showing that to a stranger"

Morrow- "you seemed to be interested in the first pic and the bottom the pic was taken with. Thought you might be curious to see more. I can tell that your are slightly into it"

Woodcocklong- "Where do you meet them?"

Morrow- "Around town. Concerts, downtown, drake park, sometimes siblings of friends. I don't mind getting them weed cuz I've been there when I was younger. If they are curious about other boys I give them a lot more weed than they can buy to come chill with me"

. . . .

Woodcocklong- "Ah okay so what's the typical age and how old are you?"

Morrow- "So like 12-16. I'm 20"

Morrow sends Woodcocklong an image of naked prepubescent boy.

Woodcocklong- "I'd be more into girls than boys at that age"

Morrow sends Woodcocklong an image of a prepubescent girl holding a young male's penis while they kiss.

Morrow- "Can make that happen if you really wanted to"

Woodcocklong- "That would be hot. But I'm a little paranoid"

Morrow- "What worries you bro? Getting caught?" Morrow sends another image.

Morrow sends Woodcocklong an image of a naked prepubescent girl engaged in sexual intercourse with what appears to be an adult male.

Woodcocklong- "Well yeah. Worried about prison mainly"

Morrow- "We can go slow and see how you feel. I promise I won't get you in trouble. We be real secretive and only do it with kids I can trust"

Woodcocklong- "Alright I'm willing to meet you and discuss it and see how it feels"

Morrow- "Alright cool sounds like a deal."

Morrow- "Do you have any other questions or things you wanna know?"

Woodcocklong- "Do the girls usually just suck or do they sometime like to be fucked too?"

Woodcocklong- "And how many kids have you played with?"

Morrow- "2 girls and 4 boys. And I did fuck one of the girls yes. Her name is [Redacted] and she is 13"

Woodcocklong- "Is she in any of the pics you sent and can you get her back to fuck again?"

Morrow Sends Woodcocklong three images of a young male and prepubescent female engaged in sexually explicit behavior.

Morrow- Morrow then sent three additional images and responded "Yes I can she is a little older than in the pics that was the first time with her."

Morrow- "I edited them with the background colors just so no one can tell it was in my bedroom"

Woodcocklong- "Nice she is very cute"

Morrow- "So that's who you for sure wanna fuck?"

Morrow sends another image to Woodcocklong but it is no longer present on the phone.

Woodcocklong- "Yeah"

Morrow- "Anything else you wanna know about her first?"

Woodcocklong- "I should probably know as much as possible. Where did you find her? Dis she enjoy being fucked or did it hurt her? What else did she let you do with her?"

Morrow- "She goes to [school name redacted] and just started getting into smoking pot. She has an older brother who I was friends with but he went away for college. She enjoys

sucking cock but her pussy is so small and tight I'm sure it hurts sometimes but she still keeps coming back for more pot.

Woodcocklong- "So you fuck her pretty often then?"

Morrow- "At least once a month. I just pick her up from school and take her home and then her place is like two blocks away I get her home before her parents even know"

Woodcocklong- "Nice man I'll have to see when my next day off is, I work weekdays usually until 4 but sometimes I get a day off so I'd be able to play with her right after school. But not sure when that will be"

Woodcocklong- "So your place is a good spot to fuck them? Neighbors don't get nosy about kids coming over?"

Morrow- "Yeah it's all good I got a big fence in front of my driveway no one really is ever really around"

. . . .

Morrow sends Woodcocklong an image of a naked prepubescent male.

Woodcocklong- "Probably not, I'm really only into girls when it comes to kids"

Morrow- "Have you ever tried anything like this or thought about doing stuff before? Maybe will a girl was sleeping or something?"

Woodcocklong- "I've thought about it for a long time but never actually had the chance"

Woodcocklong- "I've always been very careful and tell myself I'd only go through with it if there was no chance of being caught"

Morrow- "That's probably best. It's just kind of how it has to be but like I said I have a pretty good system going and it's worked since"

Woodcocklong- "How long have you been doing it that way? And did you have a different method before?"

Morrow- "For about 4 years. I used to try touching them in their sleep but it's risky. Much easier when you have their trust and permission"

Woodcocklong- "Yeah probably makes it a lot more enjoyable they're into it too"

Woodcocklong- "Although touching them while they sleep would be fun but very risky"

Morrow- “Yeah it was easier slipping them a sedative before bed”

Woodcocklong- “How many did you do that with?”

Morrow- “I had to do that with 2 boys who weren’t into being with another boy. But really wanted to touch them. I just felt them up a little bit. Touched their abs and played with their little cock and balls.”¹

Morrow also had numerous images of a teenage minor male from Bend on his phone, some of which it appears Morrow took of the minor in church, and others he apparently obtained from social media accounts. He also had a nude image of a minor male from Oregon, who he had been chatting with, and whose face Morrow posted online in a Kik child pornography group. Yet another young man from Bend was “catfished” into sending nude images of himself to someone he believed was a female. He was later told that someone was posing as him online, harassing others using his identity, and distributing the nude images of him he had been tricked into sending. This man’s nude images were found on Morrow’s phone.

During the search warrant, Morrow told the FBI that a Grindr user had threatened to hurt Morrow and others if he did not help the user share child pornography, and that the user knew where Morrow lived and had nude images and videos of Morrow. Morrow also claimed he had been asked by a Kik group to solicit nude images and to “catfish” people on Tumblr, and had been sent links to child pornography sites to blackmail other Kik users. And while Morrow claimed he received no sexual gratification from child pornography, he possessed it on his phone and had no evidence supporting his claim of blackmail. Morrow also provided the names of four people he said were victims of a similar blackmail scam—though it appears that Morrow was the one who was harassing them.

¹ “Woodcocklong” was identified as Forest Baer, charged federally, and is pending sentencing in front of this Court.

B. The Charges & Guideline Computations

Morrow waived indictment and pleaded guilty to an information charging distribution of child pornography. The government concurs with the guideline calculations in the PSR:

Guidelines	Amount
Base offense level USSG § 2G2.2(a)(2)	22
CP involves a prepubescent minor USSG § 2G2.2(b)(2)	+2
Distribution of CP USSG § 2G2.2(b)(3)(F)	+2
CP has sadistic or masochistic conduct USSG § 2G2.2(b)(4)(A)	+4
Use of a computer USSG § 2G2.2(b)(6)	+2
Possession of 60 or more images USSG § 2G2.2(b)(7)(D)	+5
Acceptance of Responsibility USSG § 3E1.1	-3
Total Offense Level	34
Resulting Guideline Range	151-188 months

ARGUMENT

Pierce Morrow caused real harm. Not only by possessing and distributing child pornography, but by sending it unsolicited to others, impersonating people, and making threats in order to obtain nude images. His campaign of online harassment hurt not only those he pursued, harassed and whose images he posted, it hurt at least one person he impersonated. And the harm he caused was real, as eloquently stated in a letter provided to the Court and counsel detailing the damage and suffering Morrow caused.

Morrow clearly has a sexual interest in children, notwithstanding his denials. And while his online claims of having engaged in sex with children may all be fantasy, he encouraged another young male's interest in abusing children, telling him it was safe and that the young girl

was willing—arousing the male’s interest and causing him to think about when his schedule would allow him to do it. Because this chat took place through the day of Morrow’s arrest, what would have happened next will remain unknown.

Morrow describes being bullied from middle school on, which is undoubtedly correct. He has no prior convictions and has done well on pretrial release, and the government is recommending a three-level downward variance pursuant to 18 U.S.C. § 3553(a).

But Morrow skillfully inflicted the very harm he complains of, preying on young men’s fears and vulnerabilities, embarrassing them, threatening them, exposing them, and hurting them. Morrow attempted to support his claim of being blackmailed by providing the names of other victims of a similar scheme. The FBI contacted those people, and they were victims. Of Pierce Morrow.

Morrow must accept responsibility and make many changes before he can be a safe, productive member of the community. If he continues to cling to his claim of blackmail and denial of a sexual interest in children, he cannot meaningfully address his issues. This case is different from someone who hides their conduct and tries to chat privately online, Morrow mixed child pornography with online stalking, solicitation, and enticement of others with similar interests. The community needs to be protected from him, and a lengthy sentence is warranted.

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Conclusion

The government recommends that the Court impose a sentence of 108 months' imprisonment, ten years of supervised release and a \$100 fee assessment.

Dated: November 27, 2020

BILLY J. WILLIAMS
United States Attorney

s/ Jeffrey S. Sweet
JEFFREY S. SWEET
Assistant United States Attorney